

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DENISE THOMAS,)	
)	
Plaintiff,)	
v.)	NO. 19-cv-5742
)	
GREYHOUND LINES, INC., a/k/a)	
TRANSPORTATION LEASING CO.)	JURY DEMANDED
and DANIEL MALONE,)	
)	
Defendants.)	

NOTICE OF REMOVAL

To: The United States District Court for the Northern District of Illinois.

Plaintiff's Counsel: Robert A. Langendorf, P.C.
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NOW COMES Defendants, GREYHOUND LINES, INC., a/k/a TRANSPORTATION LEASING CO. ("Greyhound") and DANIEL MALONE, by their attorneys, LEWIS BRISBOIS BISGAARD & SMITH LLP, and pursuant to 28 U.S.C. §1441, 28 U.S.C. §1446, and 28 U.S.C. § 1332, hereby files their Notice of Removal of this cause to the United States District Court for the Northern District of Illinois, from the Circuit Court of Cook County, Illinois, and respectfully state:

1. On July 19, 2019, Plaintiff filed an action in the Circuit Court of Cook County, Illinois, entitled *Thomas v. Greyhound Lines, Inc. and Malone*, Case No. 2019L007961. (*See Compl.*, attached as Ex. A.) Defendants in said action now file this Notice of Removal. Upon receiving a file-marked copy thereof, Defendants will serve this Notice of Removal upon Plaintiff as well as file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, Illinois.

2. A summons and copy of the Complaint was served on Greyhound on July 29, 2019. A summons and copy of the Complaint was served on Daniel Malone. Accordingly, this Notice of Removal is timely within the 30 day deadline.

3. Plaintiff is a citizen of the state of Illinois and currently resides and has resided in Illinois.

4. Greyhound is a corporation organized under the laws of the State of Delaware. Its principal place of business is located in the State of Texas, with its headquarters located at 350 North St. Paul Street in Dallas, Texas 75201. Therefore, Greyhound is a citizen of the states of Delaware and Texas. (*See Corporate Disclosure Statement*, attached as Ex. B.)

5. Daniel Malone is a citizen of the state of Tennessee and currently resides and has resided in Tennessee. Daniel Malone consents to this removal.

6. The Complaint alleges that Plaintiff suffered personal injury during an accident that occurred while Plaintiff was a passenger of a Greyhound bus traveling in the City of Frankfort, County of Clinton, and State of Indiana.

7. The amount in controversy in this cause exceeds \$75,000.00. Plaintiff alleges that Plaintiff sustained injuries of a personal and pecuniary nature that exceed the jurisdictional minimum of the Law Division of the Circuit Court of Cook County. Plaintiff has demanded judgment in excess of \$50,000.00. Plaintiff's *ad damnum* exceeds \$100,000. Moreover, based on the allegations in the Complaint, Plaintiff may be claiming personal injury, emotional harm, loss of earnings and future economic prospects, and medical bills.

8. Because this controversy is entirely between citizens of different states diverse from the Plaintiff and the forum, and the amount in controversy exceeds \$75,000, Defendants desire to

remove said cause from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois based on diversity jurisdiction.

WHEREFORE, Defendants GREYHOUND LINES, INC., a/k/a TRANSPORTATION LEASING CO. (“Greyhound”) and DANIEL MALONE respectfully request that this case proceed before the United States District Court for the Northern District of Illinois as an action properly removed.

Respectfully submitted,

/s/ Timothy J. Young

Timothy J. Young (ARDC No. 6192231)

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